



**CONTRA COSTA
WATER DISTRICT**

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Delta Stewardship Council
650 Capitol Mall
Sacramento, CA 95814

Dear Chairman Isenberg and Council Members:

Contra Costa Water District (CCWD) commends the Delta Stewardship Council on the effort that is being put forth to create the Delta Plan and Interim Delta Plan. The current Interim Plan is a significant improvement over the last version. We are pleased to see many of the comments we have submitted incorporated into this version. In particular we appreciate the inclusion of early actions in the plan.

Delta water quality is a key concern of CCWD, and we would like to offer some suggestions for improving the discussion of historical water quality in the Interim Plan. Water quality degradation has been a concern in the Delta for over a century, and it must be addressed in order to protect and restore the environment and the drinking water beneficial uses of the Delta. Improving the description of water quality in the Interim and Final Delta Plan will both increase the technical credibility of the documents and highlight the importance of this issue. Attached is suggested language for your use, followed by one additional suggested edit for technical accuracy.

CCWD appreciates the opportunity to participate in the development of the Interim Plan and we look forward to continuing to work together in the future. Please call me at (925) 688-8100 or Maureen Martin at (925) 688-8323 if you have any questions or concerns.

Sincerely,

Greg Gartrell
Assistant General Manager

GG/MM:wec

Attachment

cc: Delta Stewardship Council

Attachment
Technical Edits for Final Interim Plan

Remove this paragraph from the Interim Plan
Page 3 of Final Interim Plan

28 Water quality has been a concern in the Delta since the late 1880s, when water users considered
29 methods to reduce the adverse impact of high salinity intrusion into the central Delta near Antioch and
30 the south Delta near Stockton and Manteca. Studies conducted over the past 120 years to reduce the
31 impacts of salinity on municipal, industrial, and agricultural users have considered saltwater tidal gates
32 near Suisun Bay, methods to improve water circulation in the Delta, and facilities to convey water from
33 the Sacramento River to the San Joaquin River.

Replace with ...

Salinity levels in Delta water have long been a concern. The two primary sources of salinity in the Delta are seawater intrusion and agricultural drainage. The contribution of salt from each of those processes to the overall salinity varies by season and by location within the Delta. For example, in the western Delta near Antioch seawater intrusion is the primary source of salinity whereas salinity near Stockton is often largely due to agricultural runoff. Prior to European settlement, Delta salinity was primarily due to seawater intrusion and the extent of intrusion depended on the amount of freshwater flowing out of the Delta. Since the late 1880s, major anthropogenic modifications to the Delta that affect salinity intrusion can be classified into two categories: physical modifications of the landscape (e.g., removal of tidal marsh, separation of natural floodplains from valley rivers, construction of permanent artificial river channels, and land-use changes) and water management activities (e.g. diversion of water for direct agriculture, municipal, or industrial use, and reservoir storage and release operations).

Over the past century, many strategies have been employed to manage increasing salinity in the Delta. Salinity has been and continues to be managed by both engineered solutions and by regulations. Engineered solutions include rock barriers and gates such as the Delta Cross Channel. Salinity regulations became prominent in 1978 when the Water Quality Control Plan and State Water Resources Control Board (SWRCB) Decision 1485 established water quality requirements at key locations to protect agriculture, municipal and industrial uses. The Bay-Delta Accord of 1994 and subsequent SWRCB Water Rights Decision 1641 have enhanced salinity regulations to protect fisheries. Despite many salinity management strategies over the past century, increasing salinity remains a key concern that must be addressed in order to protect and restore both the beneficial uses of the Delta and the environment.

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12 the Delta to be maintained in part through the operation of the SWP and CVP in accordance with
13 the Coordinated Operations Agreement that was adopted by the state Legislature and Congress.

Update line 13 to say

...the Coordinated Operations Agreement that was adopted by federal law PL 99-546.